
TECHNICAL REVIEW DOCUMENT
for
OPERATING PERMIT 03OPSU259
Minor Modification

Summit County Landfill
Summit County
Facility ID: 1170017

Prepared by Lisa Clarke
May – June 2008

1. Purpose

This document will establish the basis for decisions made regarding the Applicable Requirements, Emission Factors, Monitoring Plan and Compliance Status of Emission Units covered within the Colorado Title V Operating Permit proposed for this site. It is designed for reference during review of the proposed permit by the EPA, during Public Comment, and for other interested parties. Information in this report is primarily from the minor modification application received on February 28, 2008 and administrative amendment received May 30, 2008, as well as correspondence with the applicant. This narrative is intended only as an adjunct for the reviewer and has no legal standing.

Any revisions made to the underlying construction permits associated with this facility, made in conjunction with the processing of this operating permit application, have been reviewed in accordance with the requirements of Regulation No. 3, Part B, Construction Permits, and have been found to meet all applicable substantive and procedural requirements. This operating permit incorporates and shall be considered to be a combined construction/operating permit for any such revision, and the permittee shall be allowed to operate under the revised conditions upon issuance of this operating permit without applying for a revision to this permit or for an additional or revised Construction Permit.

2. Source Description

The Summit County Landfill is classified as a municipal solid waste landfill, which falls under the Standard Industrial Classification 4953. This facility is located at 639 Landfill Road, Dillon, Summit County, Colorado. There are no affected states within 50 miles of this facility. The following Federal Class I designated areas are within 100 kilometers of the plant: Maroon Bells-Snowmass Wilderness, Rocky Mountain National Park, Flat Tops Wilderness Area, and Eagles Nest Wilderness Area.

The facility is located in an area designated as attainment for all criteria pollutants. Based on the information provided by the applicant, the facility is categorized as a minor stationary source for PSD applicability purposes (no single criteria pollutant emissions with a Potential-to-Emit greater than 250 TPY) as of the issue date of this permit. The source therefore is not subject to the PSD review requirements of 40 CFR 52.21 (Colorado Regulation No. 3, Part D, Section IV). Future modifications to this facility may result in an exceedance of the major source threshold. Once that threshold is exceeded, future modifications at this facility resulting in a significant net emissions increase for any pollutant as listed in Regulation No. 3, Part D, Section II.A.44 or a modification which is major by itself may result in the application of the PSD review requirements.

Facility-wide emissions are outlined below:

Pollutant	Potential-to-Emit (tons/yr)	2008 Actual Emissions (tons/yr)
PM ₁₀	12.73	-
PM	48.80	-
VOCs	21.43	13.32
HAPs	3.70	2.57

The potential-to-emit VOC emissions are calculated from EPA's Landfill Gas Model. This emission rate is based on the landfill's design capacity of 3,420,000 megagrams of degradable waste, and the landfill will not emit at this maximum rate until 2027, the year after the landfill closes. The actual VOC emissions are also based on EPA's Landfill Gas Model. However, this emission rate was the emission rate predicted by the model for the 2008 calendar year (As reported on the APEN dated February 28, 2008).

The Summit County Landfill began accepting waste in 1964. An initial design capacity report was submitted to the Division on December 23, 1998. The landfill had a maximum design capacity of 1,460,000 megagrams (Mg) at that time. An amended design capacity report was submitted to the Division on February 05, 2002 to increase the maximum capacity to 3,420,000 Mg due to an expansion at the landfill. This increase caused the landfill to exceed 2.5 million Mg, and subjected it to the requirements of the Standards of Performance for Municipal Solid Waste Landfills (40 CFR Part 60, Subpart WWW, as adopted in Colorado Regulation No. 6, Part A). NSPS WWW requires landfills over 2.5 million Mg to obtain an operating permit. Summit County expects to operate this landfill until 2026.

3. Discussion of Modifications Made

Source Requested Modifications

On January 22, 2007, the source requested that the title for the signing responsible official be changed to the generic Board of County Commissioners Chair since the position changes annually. Summit County will print or type in the chair's name as part of the reporting/sign-off process. The source also asked for the waste acceptance limit in Section II, Condition 1.2 to be changed from units of cubic yards to tons. When the trash weight was converted from volume to tonnage in November 2002, it was found that on average a cubic yard of trash weighed a little over 600 lbs.

The applicant requested an increase in potential VOC emissions on February 28, 2008 due to the most recent Tier II testing, which resulted in a NMOC concentration of 188 ppmv, conducted on December 2007 initially and then revised the request to propose using an NMOC concentration of 1,550 ppmv to result in an emission rate of 21.43 tons VOC per year (maximum occurring in 2027) to ensure no future compliance issues.

On May 30, 2008, the source requested that Kenrick Pocius, the County Engineer/Landfill Director be the responsible official for all reporting matters regarding this Operating Permit.

Other Modifications

Section II.1: Fugitive particulate matter emissions & landfill gas emissions

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- Condition 1.6 was updated to reflect a recent re-opening of a landfill permit by the U.S. EPA for consistency purposes.

Section IV: General Conditions

- Added language from the Common Provisions (new condition 3). With this change the reference to “21.d” in Condition 20 (prompt deviation reporting) will be changed to “22.d”, since the general conditions are renumbered with the addition of the Common Provisions.
- Removed the upset and breakdown provisions from Condition 4 (emergency provisions) since they are included in the Common Provisions.
- The citation in General Condition 16 (open burning) was revised. The open burning requirements are no longer in Reg 1 but are in new Reg 9. In addition, changed the reference in the text from “Reg 1” to “Reg 9”.

Appendices:

- Appendices B and C were modified to make the permit more consistent with recently issued permits.
- Updated the addresses in Appendix D.
- Updated Appendix F with the changes mentioned above.